

EXHIBIT 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**ARISTA RECORDS LLC; ATLANTIC RECORDING
CORPORATION; BMG MUSIC; CAPITOL RECORDS, INC.;
ELEKTRA ENTERTAINMENT GROUP INC.; INTERSCOPE
RECORDS; LAFACE RECORDS LLC; MOTOWN RECORD
COMPANY, L.P.; PRIORITY RECORDS LLC; SONY BMG
MUSIC ENTERTAINMENT; UMG RECORDINGS, INC.;
VIRGIN RECORDS AMERICA, INC.; and
WARNER BROS. RECORDS INC.,**

Plaintiffs,

v.

**LIME WIRE LLC; LIME GROUP LLC; MARK GORTON;
GREG BILDSON; and M.J.G. LIME WIRE FAMILY
LIMITED PARTNERSHIP,**

Defendants.

**06 Civ. 5936 (GEL)
ECF CASE**

**DECLARATION OF KATHERYN COGGON IN OPPOSITION
TO DEFENDANTS' MOTIONS AND IN SUPPORT OF
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

I, Katheryn Coggon, have personal knowledge of the facts stated below
and, under penalty of perjury, hereby declare:

1. I am an attorney at Holme Roberts & Owen LLP (HRO), where I have
practiced law since 1995. My office is located at 1700 Lincoln Street, Suite 4100,
Denver, Colorado 80203. I submit this declaration in opposition to defendants' motion
for summary judgment and in support of plaintiffs' motion for partial summary judgment.

2. HRO represents a national counsel a number of large record
companies, including EMI Recorded Music, Sony BMG Music Entertainment, Universal
Music Group and Warner Music Group, as well as all of their subsidiaries and affiliates
("Record Companies"), in pursuing claims of copyright infringement against individuals

who have illegally uploaded and downloaded sound recordings on peer-to-peer networks.

HRO has been national counsel for this program since February 1, 2006.

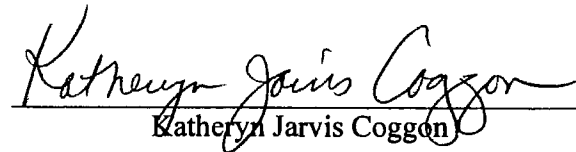
3. I am responsible for preparing the copyright lawsuits that our Record Company clients file. I am also responsible for maintaining and tracking the files and information for all the individuals identified as infringers of our clients' copyrights as part of this program, whether the lawsuit against those individuals was brought by our co-counsel or our predecessor national counsel.

4. As of August 28, 2008, the Record Companies have pursued copyright enforcement actions against over 28,000 users of peer-to-peer (P2P) networks. Of those, 10,939 have been against users of the LimeWire P2P client. The Record Companies have sued 6262 LimeWire users. The Record Companies have obtained 726 judgments against LimeWire users (449 of those were stipulated judgments) and settled another 3782 claims against LimeWire users.

5. The lawsuits against LimeWire users have included over 52,000 claims that sound recordings owned or controlled by the Record Companies were infringed. The Record Companies have obtained default or summary judgments against 19 LimeWire defendants and stipulated judgments against 40 LimeWire defendants that include claims for the 30 sound recordings at issue in the instant litigation, including judgments for infringement of "Father of Mine" by Everclear, "Papercut" by Linkin Park, "A Long December" by Counting Crows, "Invisible Man" by 98 Degrees, "Joy and Pain" by Maze, "Cold Hearted" by Paula Abdul, "I'm So Into You" by SWV, "Semi-Charmed Life" by Third Eye Blind, "Long Day" by Matchbox 20, "Pulling Teeth" by Green Day, and "One Love" by Nas.

I declare under penalty of perjury under the laws of the United States that
the foregoing is true and correct.

Executed on Sept. 8, 2008 in Denver, CO.


Kathryn Jarvis Coggon